

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

LISA BROWN, M.D.,)
)
Plaintiff,)
)
v.) Civil Action No. 05-32 E
)
HAMOT MEDICAL CENTER,)
)
Defendant.)

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U.S. DISTRICT COURT
WESTERN DISTRICT OF PENNSYLVANIA

PLAINTIFF'S MOTION FOR PARTIAL SUMMARY JUDGMENT

In accordance with Federal Rule of Civil Procedure 56, Local Rule 56.1, and the court's June 21, 2005 Case Management Order, as modified, Lisa Brown hereby moves for partial summary judgment on certain claims for breach of contract.

The questions on which Brown seek summary judgment are more fully set forth in the accompanying Concise Statement of Material Facts in Support of Lisa Brown's Motion for Summary Judgment, Brief in Support of Motion for Summary Judgment, and Appendix in Support of Motion for Summary Judgment, to which the court is respectfully referred.

Respectfully submitted,

Leech Tishman Fuscaldo & Lampi

By: /s/ Patrick Sorek

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Date: August 15, 2006